

RECEIVED
FEDERAL
OPERATIONS CENTER

2002 DEC 26 A 10:33

Douglas J. Pauls, Treasurer
Commerce Bancorp - Political Action Committee FED
1701 Route 70 East
Cherry Hill, New Jersey 08034

Atissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

ID # C00303156

Reference: April Quarterly Report (1/1/02-3/31/02) and July Quarterly Report (4/1/02-6/30/02)

Dear Ms. Sagri:


We are in receipt of the Office of Administrative Review's analysis of the reports referenced above and respond to your questions as follows:

- Schedule A of the April Quarterly Report (1/1/02-3/31/02) reported an excessive contribution, which has been corrected by refunding \$2,500 to Vincent Stafford. Copy of refund check is attached.
- Schedule B of the July Quarterly Report (4/1/02-6/30/02) has been amended to provide address, state and congressional district for each contribution. Copy attached.
- Schedule C of the July Quarterly Report (4/1/02-6/30/02) was corrected when previous reports were corrected per letter of 12/18/02. See letter to FEC dated 12/18/02.
- The contribution listed on Schedule B of the April Quarterly Report (1/1/02-3/31/02) stating Robert Toricelli as recipient has been corrected to reflect no specific recipient. Copy attached.
- Schedule A of the April Quarterly Report (1/1/02-3/31/02) was corrected when the previous reports were corrected per letter of 12/18/02. See letter to FEC dated 12/18/02.
- Schedule C of the April Quarterly Report (4/1/02-6/30/02) was corrected when the previous reports were corrected per letter dated 12/18/02. See letter to FEC dated 12/18/02.

- I acknowledge that an excessive contribution was made on the April Quarterly Report and that the excessive contribution was subsequently corrected by obtaining a refund reflected on the October Quarterly Report. Please note that the correction was made in a timely fashion.

If you have any questions regarding the corrections and/or the copies enclosed please feel free to contact me at (856) 751-9000.

Sincerely,


Douglas J. Pauls, Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

Douglas J. Pauls, Treasurer
Commerce Bancorp Inc. Political Action
Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

DEC 11 2002

Identification Number: C00303156

Reference: April Quarterly Report (1/1/02-3/31/02)

Dear Mr. Pauls:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

COMMERCE BANCORP INC. - POLITICAL ACTION COMMITTEE FED
PAGE 2

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule C supporting Line 9 discloses outstanding balances at the close of the period for the **LOANS** owed to your committee by **COMPAC NJ**, which differ from FEC calculations. Please amend your report to clarify these discrepancies.

-Schedule B of your report (pertinent portion(s) attached) discloses an excessive contribution(s) made to a federal candidate(s). The Act prohibits a multi-candidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election. 2 U.S.C. §441a(a)

The Commission notes the Receipt of the Refund of the excessive contribution(s) on your October Quarterly Report. Although the Commission may take further legal action concerning the excessive contribution(s), your prompt action in obtaining a refund or redesignating the contribution(s) will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements,

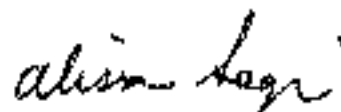
FIXED WITH
OTHER REPORT

RECEIVED
FEDERAL ELECTION COMMISSION
OCT 10 1997

COMMERCE BANCORP INC. - POLITICAL ACTION COMMITTEE FED
PAGE 3

designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FORM LINE NUMBER		PAGE	OF
<input checked="" type="checkbox"/> 12a	<input type="checkbox"/> 12b	<input type="checkbox"/> 12c	<input type="checkbox"/> 12d
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16

Any information copied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (or Fund)

COMMERCE BANK PAC-FED

Full Name (Last, First, Middle Initial)

A. WIDERMAN, WILLIAM

Mailing Address

1621 LOCUST ST.

City

PHILADELPHIA, PA 19103

FEC ID number of contributing
federal political committee

C

Name of Employer

COMMERCE BANK

Occupation

BANKER

Receipt For:

☒ Primary ☐ General
☐ Other (specify) _____

Aggregate Year-to-Date \$

500000

Date of Receipt

01/23/2003

Amount of Each Receipt This Period

500000

Full Name (Last, First, Middle Initial)

B. STRYKER, VINCENT

Mailing Address

175 S. 18TH ST.

City

PHILADELPHIA, PA 19103

FEC ID number of contributing
federal political committee

C

Name of Employer

COMMERCE BANK

Occupation

BANKER

Receipt For:

☒ Primary ☐ General
☐ Other (specify) _____

Aggregate Year-to-Date \$

750000

Date of Receipt

01/23/2003

Amount of Each Receipt This Period

750000

Full Name (Last, First, Middle Initial)

C. BURKE, BRIAN

Mailing Address

110 CENTRAL AVE.

City

NEW PROVIDENCE, NJ 07974

FEC ID number of contributing
federal political committee

C

Name of Employer

COMMERCE BANK

Occupation

BANKER

Receipt For:

☒ Primary ☐ General
☐ Other (specify) _____

Aggregate Year-to-Date \$

500000

Date of Receipt

03/11/2002

Amount of Each Receipt This Period

500000

SUMMARY of Receipts This Page (continued)

TOTAL This Portion (last page this line number only)

1750000

SCHEDULE B (FEC Form 30)
ITEMIZED DISBURSEMENTS

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 FOR LINE NUMBER:
 (check only one)

PAGE OF

☐ 21 ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28 ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any individual mentioned to solicit contributions from such associations.

NAME OF COMMITTEE (in full)

COMMERCE BANKCORP PAC-FED

Full Name (Last, First, Middle Initial)

A. COLORADO SENATE 2012

Mailing Address

City

State

Zip Code

Purpose of Disbursement

CONTRIBUTION

Candidate Name

JON CORZINE

Office Sought

☐ House☒ Senate☐ President

Disbursement For

☒ Primary☐ General☐ Other (specify) *

State: NJ

District:

Date of Disbursement

01/31/2012

Amount of Each Disbursement This Period

400000

Full Name (Last, First, Middle Initial)

B. TREFFINGER FOR SENATE

Mailing Address

235 PLUMMER AVE.

City

WEST ORANGE NJ

State

Zip Code

Purpose of Disbursement

CONTRIBUTION

Candidate Name

JIM TREFFINGER

Office Sought

☐ House☒ Senate☐ President

Disbursement For

☒ Primary☐ General☐ Other (specify) *

State: NJ

District:

Date of Disbursement

02/20/2012

Amount of Each Disbursement This Period

1000000

Full Name (Last, First, Middle Initial)

C. MATHEUSSEN FOR SENATE

Mailing Address

PO BOX 8019

City

TURNERSVILLE NJ 08012

State

Zip Code

Purpose of Disbursement

CONTRIBUTION

Candidate Name

JOHN MATHEUSSEN

Office Sought

☐ House☒ Senate☐ President

Disbursement For

☒ Primary☐ General☐ Other (specify) *

State: NJ

District: 4th

Date of Disbursement

03/15/2012

Amount of Each Disbursement This Period

300000

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

700000

700000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Douglas J. Pauls, Treasurer
Commerce Bancorp Inc. - Political Action
Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

DEC 11 2002

Identification Number: C00303156

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Pauls:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

fixed
-Please amend Schedule B supporting Line 23 by providing the address, state and congressional district for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

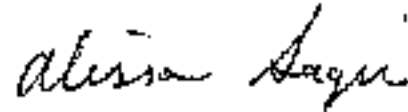
fixed with other reports
-Schedule C supporting Line 9 discloses outstanding balances at the close of the period for the **LOANS** owed to your committee by **COMPAC NJ**, which differ from FEC calculations. Please amend your report to clarify these discrepancies.

-Schedule B supporting Line 23 of your report discloses a contribution to **New Jersey Senate 2002**; however, you have disclosed **Robert Torricelli** as the recipient in the candidate name field. Please clarify whether this was an earmarked contribution made by your committee through the **New Jersey Senate 2002** committee to this candidate, or if you made the contribution to the political committee exercising no direction or control over how the funds were to be used. If the latter is the case, please do not include the candidate's name in the candidate name field on future reports.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements,

designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alissa V. Sagri
Campaign Finance Analyst
Reports Analysis Division

July Quarterly Report 22037903436 (4/1/02 - 6/30/02)

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such contributors.

NAME OF COMMITTEE (in full)

COMMERCE BANKERS PAC-FED

Full Name (Last, First, Middle Initial)

A. NEW JERSEY SENATE 2002

Date of Disbursement

15 28 2002

Mailing Address

303 GEORGE ST.

City

NEW BRUNSWICK

State

08901

Zip Code

Amount of Each Disbursement this Period

10,000.00

Purpose of Disbursement

CONTRIBUTION

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

Date of Disbursement

06 30 2002

B. FERGUSON FOR CONGRETS

Mailing Address

1001 STUYVESANT AVENUE

City

UNION NJ

07087

State

Zip Code

Amount of Each Disbursement this Period

5,000.00

Purpose of Disbursement

CONTRIBUTION

Candidate Name

MIKE FERGUSON

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State: NJ

District: 7th

Full Name (Last, First, Middle Initial)

Date of Disbursement

C.

Mailing Address

City

State

Zip Code

Amount of Each Disbursement this Period

Purpose of Disbursement

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other (specify) ▼

State:

District:

SUBTOTAL of Disbursements This Page (optional)

15,000.00

TOTAL This Period (last page this line number only)

15,000.00

1090

COMMERCE BANCORP INC.

POLITICAL ACTION COMMITTEE, FED

1701 RT. 70, E.
CHERRY HILL, NJ 08003

12/24

2002

51-1010
312PAY
TO THE
ORDER OF Vincent J. Stafford**

\$ 2,500.00**

Two thousand five hundred and 00/100

DOLLARS



1-800-YES-2000

COMMERCE ATMIUM, 1701 RT. 70 EAST
CHERRY HILL, NJ 08003

FOR

⑈001090⑈ ⑆031201380⑆

40 3235 511

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.



Hand Delivered

Date of Receipt

12/26/02

First Class Mail

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Registered/Certified Mail

POSTMARKED (R/C)



No Postmark



Postmark Illegible

Received from the House office of Records
and Registration

Date of Receipt

Received from the Senate Office of Public
Records

Date of Receipt



Other (Specify):

Postmarked

and/or Date of Receipt

Electronic Filing



PREPARER

12/26/02

DATE PREPARED